

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)
SALDUTTI LAW GROUP

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In Re:

Fastline Cargo, LLC d/b/a FLC,

Debtor.

Case No.: 24-17484-ABA

Chapter: 11

Hrg Date: Sept. 17, 2024 at 10:00AM

Judge: Hon. Andrew B. Altenburg, Jr.

**NOTICE OF SANTANDER BANK, N.A.'S MOTION FOR RELIEF FROM STAY
PURSUANT TO 11 U.S.C. § 362(d)(1)**

TO: Clerk, United States Bankruptcy Court
District of New Jersey
Camden, NJ

ALL PARTIES ON THE ATTACHED SERVICE LIST

**SANTANDER BANK, N.A. HAS FILED A MOTION FOR RELIEF FROM THE
AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362(d)(1) TO ALLOW IT TO
EXERCISE ITS APPLICABLE NON-BANKRUPTCY LAW RIGHTS TO THE
PROPERTY DESCRIBED BELOW.**

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to vacate the automatic stay as to the property identified in the attached schedules to allow the movant to proceed with its non-bankruptcy rights to the property, including but not limited to repossession and sale, or if you want the court to consider your views on the motion, then on or before **September 10, 2024**, you or your attorney must do all of the following:

- (a) file written opposition to the motion; and
- (b) attend the hearing scheduled to be held at
Mitchell H. Cohen U.S. Courthouse
400 Cooper St., 4th Floor
Camden, NJ 08101
Hon. Andrew B. Altenburg, Jr.

Courtroom 4B

On September 17, 2024 at 10:00 a.m.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting the relief.

Pursuant to L.B.R. 9013-1(b), Santander's Motion requests a waiver of the 14-day stay imposed by Fed R. Bankr. P. 4001(a)(3).

Respectfully submitted,
SALDUTTI LAW GROUP
Counsel for Santander Bank, N.A.

/s/ Rebecca K. McDowell
REBECCA K. MCDOWELL, ESQ.

Dated: August 22, 2024

DESCRIPTION OF SUBJECT PROPERTY

Six (6) Hyundai vans, VINs ending in 4014, 4016, 4019, 4024, 4025, and 4029